

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Actions*

UNDER SEAL - FBI PROTECTIVE ORDER*

**ATTORNEY'S DECLARATION FILED
IN SUPPORT OF PLAINTIFFS' LETTER-MOTION**

I, Steven R. Pounian, do hereby declare:

1. I am an attorney duly admitted before this Court, am Of Counsel to the firm of Kreindler & Kreindler LLP, attorneys for Plaintiffs, and am familiar with this litigation and the prior proceedings relevant to the subject motion.

2. I respectfully submit this Declaration on behalf of the Plaintiffs' Executive Committees (PECs) in support of Plaintiffs' April 12, 2021 Letter-Motion requesting that this Court immediately order the FBI to produce [REDACTED] interview reports of Mohdar Abdullah so that they can be used by Plaintiffs at the deposition of Mohdar Abdullah scheduled for May 7, 2021.

3. Attached as Exhibit 1 is a true and correct copy of the March 12, 2021 e-mail sent by the Plaintiffs Steering Committees to the Department of Justice and the April 6, 2021 e-mail response of the DOJ.

4. Attached as Exhibit 2 is a true and correct copy of excerpted pages from [REDACTED]
[REDACTED]

* Plaintiffs do not believe this letter motion or accompanying attorney's declaration contain any protected information. Plaintiffs request that the government immediately agree to public filing of these papers.

5. Attached as Exhibit 3 is a true and correct copy of the current privilege log submitted by the DOJ in this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
April 12, 2021

/s/
Steven R. Pounian, Esq.
Kreindler & Kreindler LLP
485 Lexington Avenue
New York, NY 10017
(212) 687-8181
spounian@kreindler.com
*On Behalf of the Plaintiffs Executive
Committees*